



August 10, 2023

VIA ECF

Hon. Katherine Polk Failla
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Taveras v. New York City, et al.* 20 Civ. 01200 (KPF)

Your Honor,

I represent the plaintiff, Alan Taveras, in the above-referenced matter. I write to respectfully request a one-week extension of time to file Plaintiff's motion for summary judgment, which is due tomorrow. Counsel for the defendant, Kerri Devine, consents to this request, and this is Plaintiff's first request for an extension of time in this regard.

The reason for the request is that I am presently in the midst of drafting oppositions to two motions for summary judgment in a multi-party commercial litigation matter venued in Kings County Supreme Court, Commercial Part in the matter of *Mawere v. Landau*, Index No. 501184/12. The *Mawere* submissions were due to be filed on Monday but, due to circumstances beyond my control, required extensions until tomorrow. And though I was hoping the submissions in the *Mawere* case would be finalized by now, I will not have sufficient time to complete my summary judgment motion in the *Taveras* matter by the deadline.

Should the Court grant the instant request, Plaintiff will file his motion for summary judgment on Friday, August 18, 2023, the City will file its cross-motion for summary judgment and opposition on September 29, Plaintiff will file his reply and opposition on October 20, and the City will file its reply on November 16, 2023.

Thank you for the Court's consideration.

Sincerely,

/s
Amy L. Bellantoni
cc: Kerri Devine (ECF)